

VSWMRs Amendment 7 Implementing Operations Manual Changes

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Implementing Operations Manual Changes

- 9VAC20-80 vs. 9VAC20-81
- Operation Manual Elements
- Implementation – DEQ perspective
- DEQ guidance document
- Implementation – Facility perspective

VSWMR 9VAC 20-80

Under current regulations:

- Ops Manual submitted with Part B permit app
- Ops Manual becomes part of facility permit
- Changes require minor permit amendment

VSWMR 9VAC 20-80

- Minor* amendments:
written approval from DEQ + notify local gov:
 - Inspections – frequency or content
 - Training plan
 - Spill or release response procedures
 - Emergency equipment list
 - Landfill management practice

VSWMR 9VAC 20-80

Permit-by-Rule condition:

- Submit to the director an operational plan describing how the Operation standards (9VAC20-80-330D, -340D, -360D, or -370D) will be met

Amendment 7 Operations Manual Changes

- Amendment 7 removes Operations Manual from Part B Application and Permit
- Ops Manual part of the operating record
- Facilities can revise their operations manual as needed – to reflect current operations.
- Section **9VAC20-81-485** added to clarify requirements

Operations Manual Requirements Applicability

Amendment 7 Part III

SW Disposal Facility Standards for Landfills
9VAC20-81-140. Operation requirements.

Amendment 7 Part IV

Other Solid Waste Management Facility Standards
9VAC20-81-340. Operation requirements.

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9VAC20-81-140. Operation requirements.

"Landfill operations will be detailed in an operations manual that shall be maintained in the operating record in accordance with **9VAC20-81-485**. This operations manual will include an operations plan, and inspection plan, a health and safety plan, and unauthorized waste control plan, an emergency contingency plan, and a landscaping plan meeting the requirements of this section and **9VAC20-81-485**. This manual shall be made available to the department when requested. If the applicable standards of this chapter and the landfill's Operations Manual conflict, this chapter shall take precedence."

Operations manual requirements **Elements** (9VAC20-81-485)

- An Operations Manual shall contain:
 - Operations Plan
 - Inspection Plan
 - Health & Safety Plan
 - Unauthorized Waste Control Plan
 - Emergency Contingency Plan
 - Landscaping Plan (only landfills)

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Operations manual requirements **Certification**

- **Certification page**
- Signed by **Responsible Official**
- Manual must adhere to 9VAC20-81 and be consistent with current operations.

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Operations manual requirements **Certification – WHEN ?**

- **Revisions** => Certification
- Minimum, **annual** certification by Responsible Official

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Operations manual requirements **Annual Certification**

First certification due date?

- No later than **December 31, 2011**
- Sooner if revised
- Review and recertify annually

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Operations manual requirements **Responsible Official**

- Defined in 9VAC20-81-10
- Duly authorized representative
- Responsible for overall operation
- Authority to sign documents

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Q & A Guidance

Question: Amendment 7 removes the requirement for an operations manual to be included as a component of the Part B application. Will I need to modify my permit to accomplish this?

Answer:

NO PERMIT AMENDMENT REQUIRED.

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Operations manual requirements **Implementation**

Certain essential operational information still in Part B application and will **continue to apply as a permit condition** and may only be revised by a permit modification:

- Hours of operation
- Daily disposal limit
- Wastes accepted
- Traffic routing
- Refuse cover-balance computations
- Stockpile sizing estimates

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Operations manual requirements **Implementation**

- Regulatory standards prevail if contradictions
- **DEQ will review during compliance inspection of operating record :**
 - ✓ Essential elements
 - ✓ Certification
 - ✓ Reflect current operations

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DEQ Guidance Memo No. 01-2011

Implementation of new operations manual requirements

- Operational details that continue to be part of the permit (Design Report)
- Contents of Operations Manual
- Revision of existing operations manuals
- Compliance with operations manuals
- Responsible official certification

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Operations manual requirements **Implementation**

Facility Perspective

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In summary

- All facilities must have an operations manual.
- Facilities can revise their manual as needed.
- Manual is part of the operating record.
- DEQ will review during compliance inspections & check for certification.
- Regulatory standards prevail if contradictions
- Some essential operational information still in the Part B application and only be revised by a permit modification.

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Operations manual requirements **Implementation**



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Questions or Comments

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